

Dave Heineman
Governor

STATE OF NEBRASKA

DEPARTMENT OF ADMINISTRATIVE SERVICES
Gerry Oligmue
Acting Director

Region 26 700 MHz Regional Planning Committee

June 6, 2006

FILED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 96-86
Comments

Dear Ms. Dortch:

Region 26 (Nebraska) 700 MHz Regional Planning Committee supports rule changes to enable broadband deployment in the Upper 700 MHz Public Safety Block.

Nebraska Region 26 is not opposed to proposals for reconfiguring the narrowband spectrum as currently assigned. Technological advances require public safety to consider available and future alternatives. This in turn requires reconsideration of previous NCC recommendations and the current 700 MHz frequency scheme.

Region 26 recommends consolidating the current narrow band allocation to accommodate a more flexible broadband block. Therefore, it is critical to consider moving narrow band frequencies now while the majority of 700 MHz plans are still being written. Public safety and spectrum management efforts will be better served in the long term by this action.

Nebraska has these objectives in mind for considering broadband technologies in 700 MHz:

- (1) Preserve voice capability as essential for public safety
- (2) Expand channel allocation to maximize broadband access and flexibility
- (3) Consider technology trends that adapt public safety needs and commercial technologies

In choosing a broadband plan for the Upper 700 MHz Public Safety Block, the Commission should prepare now to allow for a necessary degree of flexibility in the future. As regional planning committees work toward writing and finalizing their 700 MHz plans, now is an opportune time to consider these changes.

Consideration of the proposals before the Commission should, as a goal, achieve the following:

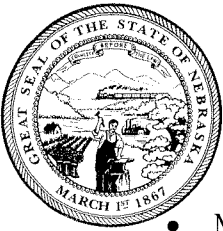
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- Minimize the number of guard bands required
- Provide regions internal flexibility to manage the guard bands between broadband/wideband and narrowband operations
- Allow individual RPCs the ability to adopt technologies that use more than 1.25 MHz

Region 26 concurs with the National Association of Regional Planning Committees (NARPC) position on aggregation of 700 MHz spectrum above 150 KHz. In addition, Region 26 supports the position that RPCs will benefit from self determination of broadband deployment and spectrum management. This will allow a more flexible approach to urban and rural wireless data alternatives. Having aggregation up to 5 MHz is feasible, and would still permit wide band operations. The choices within the region would allow use of both commercially available technologies and public safety operated systems, where the technologies can form a mix of public safety and commercially available capabilities. This seems a good alternative for future adaptation as public safety systems become more sophisticated, but do not have the ability to solely drive market interests.

Data interoperability is a notable goal that must be pursued through expanding networks and data sharing. Efforts to establish device standards and physical layer interoperability may be an impediment to this goal. Rather, it is network accessibility that offers a more effective means of data (sharing) interoperability. Devices and applications will continue to develop rapidly as network access drives the demand of public safety entities to implement data solutions for the particular needs of their agency.

Respectfully,

Mike Jeffres, Region 26 700/800 MHz RPC Chair
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